

Lawyer's Notes



The Commonwealth of Massachusetts
STATEWIDE EMERGENCY TELECOMMUNICATIONS BOARD
P.O. Box 156, Reading, MA 01867
Tel (781) 944-9113 (Voice/TTY) - Fax (781) 944-4721



ARGEO PAUL CELLUCCI
Governor

KATHLEEN M. O'TOOLE
Secretary of Public Safety

ROBERT H. WATKINSON
Executive Director

December 31, 1997

Ms. Jacquelyn M. Boyden
Chair, Erving Area/Zip Code Committee
PO Box 188, 12 East Main Street
Erving, MA 01344

Dear Ms. Boyden:

Jordan Michael from the Department of Telecommunications and Energy (DTE) forwarded your November 25, 1997 correspondence to the Statewide Emergency Telecommunications Board (SETB) for review. In discussions with Bell Atlantic, it has been determined that the Master Street Address Guide (MSAG) for the Town of Erving needs to be verified. Particularly, those streets which border or enter the surrounding municipalities of Orange, Montague, Northfield, Wendell, Gill and Warwick.

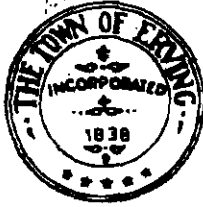
The Enhanced 9-1-1 system routes the emergency call based on the telephone number and the address where the call originated. In the case of Erving, all calls should be routed to the Shelburne Falls State Police for response. The call from 5 West Main Street was misdirected because the telephone number at that location was improperly associated with a street address in Orange.

Although a distinct area code and exchange code for all residents of Erving would simplify the process and be less confusing, it is not a necessity for the Enhanced 9-1-1 system to operate properly. It is more important that the telephone number be associated with the correct street address and municipality.

In order to ensure that Erving 9-1-1 calls are properly routed in the future, your database coordinator, Richard Newton, sent me the latest MSAG and street map, which I will forward to Bell Atlantic. Bell Atlantic will provide a list of the telephone number associated with each address to Mr. Newton, once the enclosed non-disclosure form is signed and returned to them. A joint review will then be conducted by the Bell Atlantic Database Management group and Mr. Newton to verify that the telephone numbers and addresses are properly matched, particularly in the French King Highway area and on the other border streets. The SETB will stay in close contact with this process to ensure its timely completion.

Sincerely,

cc: J. Michael, Department of Telecommunications and Energy
M. Coughlin, Bell Atlantic Database Management



TOWN OF ERVING

P. O. Box 188 12 East Main Street
ERVING, MASSACHUSETTS 01344

Tel. 508-544-3636
Fax 508-544-5436

November 25, 1997

Secretary Mary Cottrell
Department of Public Utilities
Saltonstall Building
100 Cambridge St., 12th Floor
Boston, MA 02202

Dear Secretary Cottrell:

We realize that all the state government has been involved intensively in the electric deregulation initiative, and certainly your agency is no exception. However, we are writing once again to request that the DPU authorize the Town of Erving to move into the 413 area code, and that our community be granted its own telephone exchange.

By way of background, Erving sits right on the line between the new 978 area code, and the 413 area code. The west end of Erving, where we have a library, a waste water treatment plant, a fire department, an elementary school, and our department of public works, is located in the 413 area, while the east end of Erving, where most of our municipal government offices are located, is in the 978 area code.

This has created myriad logistical problems, but we have learned to deal with them. What we cannot learn to deal with are the public safety risks that are inherent in having two area codes, and shared local exchanges.

On November 3, 1997, for example, there was a traffic accident on West Main Street in Erving. A witness called 911 from a pay phone, and the address that came up on the 911 screen was on West Main Street in Orange, not Erving. That is because the east end of Erving shares its local exchange with Orange, Warwick, Wendell and New Salem.

Route 2 is a major corridor, and is our main street. Therefore, Erving is particularly prone to serious automobile accidents. Fortunately in this case, a life was not lost. We do not want to wait for a life to be lost before we address this serious issue.

In addition to this incident, we documented four instances in the west end of Erving, in our July 28, 1997 letter to you, where emergency personnel were dispatched to residences

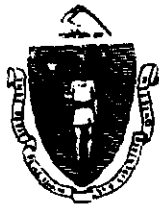
in the Montague village of Millers Falls, because we happen to share the 659 exchange with Millers Falls

We thank you for your assistance in protecting the lives of Erving residents and those who visit and pass through our community

Sincerely,


Jacquelyn M. Boyden, Chair
Erving Area Code/Zip Code Committee

cc: U.S. Senator John Kerry
U.S. Senator Edward Kennedy
Congressman John Olver
Senator Stephen Brewer
Representative John Merrigan
Senator Stanley Rosenberg
Representative Daniel Bosley
Senator Michael Morrissey
Representative Stephen Kulik
Erving Board of Selectmen
Bell Atlantic



The Commonwealth of Massachusetts
Department of Public Utilities
Leverett Saltonstall Building, Government Center
100 Cambridge Street, Boston 02202

October 16, 1997

Ms. Jacqueline M. Boyden, Chairperson
Area/Zip Code Committee
Town Of Erving
Area/Zip Code Committee
Erving Town Hall
Erving, MA 01344

Dear Ms. Boyden,

This letter is in response to the Area/Zip Code Committee's inquiry to the Department of Public Utilities ("Department") dated July 28, 1997, concerning a consolidated area code and unique exchange code for the Town of Erving. Currently, the Town of Erving includes residents in the Orange/Athol 508 area code/544 exchange code and the Millers Falls 413 area code/659 exchange code. As I understand from your letter, the Town of Erving would like to be designated with the 413 area code to include residents of both the Orange and Millers Falls areas, and with a unique exchange code.

Under Massachusetts General Law (M.G.L.) c. 159, §24, upon written complaint concerning service or charges for service, by the mayor or selectmen, or by twenty customers of telephone service, the Department shall grant a public hearing on the matter. However, before the Town of Erving initiates a formal request for investigation by the Department to modify the area code boundaries and exchange codes, I would advise the Area/Zip Code Committee to consider all the potential impacts on both business and residential customers in the Town of Erving. The expansion of the 413 area code into the 508 region may affect local and area-wide discount calling plans provided by Bell Atlantic. For instance, customers in the Orange area who currently subscribe to the Bay State East residential calling plan and the Measured Circle Calling Plan may lose the advantage of those calling plans. It is my understanding that Mike Pequignot of Bell Atlantic has indicated the need for consideration of these issues in his discussions with State Senator Stephen M. Brewer's aide, State Representative John F. Merrigan, Town of Erving elected officials, and Congressman Oliver.

Letter to Ms. Jacqueline M. Boyden, Chairperson

October 16, 1997

In regard to public safety issues raised in your letter concerning the placement of E911 calls to the appropriate Public Safety Answering Point ("PSAP"), Bell Atlantic has informed the Department after a review of their records that calls have been appropriately routed to the designated PSAP location reflected in the E911 database system. I would ask that you forward any documentation of misplaced calls to Mike Pequignot of Bell Atlantic for further review of the matter.

After your consideration of the above issues, should the Town of Erving intend to petition the Department for an investigation, the selectmen or twenty customers should address a petition to:

Mary Cottrell
Secretary
Massachusetts Department of Public Utilities
Saltonstall Building
100 Cambridge Street
Boston, MA 02202

Sincerely,



Michael Ernst,
General Counsel

cc:

Representative Daniel E. Bosley
Senator Stephen M. Brewer
Senator Edward M. Kennedy
Senator John F. Kerry
Representative Stephen Kulik
Representative John F. Merrigan
Congressman John W. Oliver
Senator Stanley C. Rosenberg
John DeStefano, Bell Atlantic
Mike Pequignot, Bell Atlantic
Sean Nestor, Bell Atlantic
Janet Gail Besser, Acting Chair
John Patrone, Commissioner

Town of Erving
Area/Zip Code Committee
Erving Town Hall
Erving, MA 01344

July 28, 1997

Ms. Mary Cottrell, Sec.
Dept. Of Public Utilities
Sahonstall Building
100 Cambridge Street 12th floor
Boston, MA 02202

Dear Ms. Cottrell:

The Town of Erving is currently served by two Area Codes/Exchanges: 413- 659 known as the Millers Falls area and 508-544 known as the Orange/Athol area. Millers Falls is a village in the Town of Montague and much confusion is created when the Millers Falls exchange has to be used by Erving residents. Most of the people who live in Erving know they live in Erving and would like to be able to be listed as an Erving resident instead of under Orange or Millers Falls. It has seemed to be very difficult for the telephone company to acknowledge that Erving residents are in the 413-659 exchange. In fact, until very recently, Nynex even gave people a hard time if they wanted to list their address as Erving instead of Millers Falls with the 413-659 phone exchange. For the past ten years (at least) Erving people in the 413-659 phone exchange have been complaining to the phone company that people trying to locate them by phone are misdirected to the 508-544 exchange where Erving was recognized. A few years ago it seemed a compromise was reached when the phone company agreed to double list all Erving residents in both the 413 and 508 phone books so they could be found no matter which directory information received the request for an Erving resident's phone number. However, that is not (still) happening. In fact, Erving townspeople/neighbors can't call other townspeople/neighbors unless they have both the Gardner/Athol and the Greenfield phone books or they call directory information which can be costly. Erving residents have to special order either the Gardner/Athol or the Greenfield phone book depending on which half of Erving they live in.

On May 7, 1997, at the Erving Annual Town Meeting, the voters decided in favor of pursuing one Area Code and one Exchange for the Town of Erving. We, as the appointed representatives for the Town of Erving, are therefore writing to you to request that NYNEX reassign the portion of Erving residents who use the 413-659 Millers Falls Area Code and Exchange, and the portion of Erving residents who use the 508-544 Orange Area Code and Exchange, to the 413 Area Code with an Exchange unique to Erving to reflect their true address. It is the sincere desire of the Town of Erving to be united under one Area Code and Exchange.

A:\areacode.wpd

The reasons for this change are numerous, but a few of the most important are listed:

- As a result of the 413-659 Millers Falls area code and exchange, Erving has had a multiple year prior history of misdirected emergency services sent to the Town of Montague because the village of Millers Falls is legally in the Town of Montague. Even since January 1997, with the advent of E911, four documented calls to E911 have resulted in emergency services being dispatched to the wrong area - in the wrong town! A potential disaster awaits us if calls are wrongly routed and a loss of life results. This is a chance the Town of Erving does not want to take and we don't think you want to take this chance either.
- Erving is in Franklin County and would like to be recognized with other Franklin County towns in the Franklin County phone book.
- Erving residents mail is often addressed to Millers Falls and then corrected by computers and postal employees to be Turners Falls. This incorrect address is a result of computer generated mail and is occurring more and more frequently as the use of computer generated data increases. The 413-659 "Millers Falls" phone exchange really creates even more confusion.
- This confusion is even more evident with the letter NYNEX sent to the chairperson of this committee when she recently moved from one location to another, both within the boundaries of the Town of Erving. Because NYNEX believed her address to be Millers Falls, or used the Millers Falls zip code of 01349 (which is a sub station of Turners Falls and is being phased out), she was sent a letter addressed to Turners Falls! SHE LIVES IN ERVING! (Yes, we are addressing the zip code issue also.)

We get further confusion from NYNEX when maps are issued showing the towns in each Area Code. See enclosed copy of map included with letter to Chairperson of this committee. The map shows the whole Town of Erving as being serviced by the 413 Area Code. In reality, half of Erving is serviced from 413-659 and the other half is serviced from 508-544. All we are asking for is to do what the most recent NYNEX map shows they are doing! Other maps showing the new 978 area code do not show Erving as being a part of that area code. Will you please do what the NYNEX maps say they are doing - which is putting all of Erving in the 413 area code and in addition, give us our own exchange?

We are enclosing copies of the following documents for your information:

- A certified copy of the Annual Town Meeting vote that took place on May 7, 1997.

DPU letter
Area Code Issues

- Copies of petitions for the area code change with signatures of registered voters.
- Authorization by the Town of Erving Select board to pursue this course of action.

We hereby respectfully request that NYNEX acknowledge the whole Town of Erving in the 413 Area Code and provide a unique Exchange called the Erving Exchange. We are not opposed to having the 659 Exchange if you are willing to rename it the Erving Exchange instead of the Millers Falls Exchange.

In closing, the members of the Area/Zip Code Committee speak for all residents of the Town of Erving and hope that you will consider our request to become a unified town seriously. We look forward to hearing from you and invite you to attend any meeting of this committee if it would help in any way towards making your decision in this matter easier. Please feel free to ask for any further information that we could provide to you which would help.

Thank you for your time and consideration in this matter.

Sincerely

Jacquelyn M. Boyden
Jacquelyn M. Boyden, Chairperson
Area/Zip Code Committee
(413) 659-3173

cc: Senator Kennedy
Senator Kerry
Representative Olver
Senator Rosenberg
Senator Brewer
Representative Kulik
Representative Merrigan
Government Regulations Office
Erving Selectmen
NYNEX Mike Pequignot
NYNEX John DeStefano
John B. Howe, Chrm DPU Comm
Janet G. Besser, DPU Comm

Enclosure (1)

These are the exchanges within the
413 Western Massachusetts calling area.



NYNEX handles both local and regional calls
 made within the 617/508 and 413 regions.
 Calls made between these two regions, as
 well as out-of-state calls, are handled by the
 long distance carrier that you have chosen.

NYNEX

CA
 CAPG

1. 2. 3.

617

September 1, 1931 - Her first child John was
born weighing 5 1/2 pounds
December 1, 1931 - Made my first flight
at age 16 the same day as my first flight
experience was 17,000 ft
May 1938 - Went to Mexico and Hawaii
Exhibit in New York City

187

805

MAP

ॐ नमो भगवते वासुदेवाय

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[illegible]

Enclosure (3)

VOTE CERTIFICATE

At a legal meeting of the qualified voters of the TOWN OF
ERVING, held May 7, 1997 and the adjourned session held May 8, 1997,
the following business was transacted under Article 16.

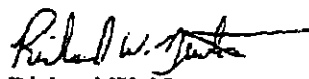
ARTICLE 16:

To see whether the Town will vote to direct the Selectmen to petition the
NYNEX Telephone Co. to have all phone service for the Town of Erving
reflect the 413 area code.

☒ Unanimous Vote
☐ Majority Vote
☐ Vote:

Date: June 30, 1997

A True copy, Attest:


Richard W. Newton
Erving Town Clerk

Enclosure (4)

We, the undersigned voters in the Town of Erving, respectfully request that the Board of Selectmen put the following article on the warrant for the 1997 Annual Town Meeting:

To see if the Town will vote to direct the Selectmen to petition the Nynex Telephone Co. to have all phone service for the Town of Erving reflect the 415 area code.

NAME	RESIDENCE	PRECINCT
Don J. [unclear]	6 Gary St Erving	1
Daniel B. Hammock	16 Wheelock St Erving	1
Lee Lane	92 Old State Rd Erving	
Don W. Thibault	21 St Erving	1
Chris Watson	15 North St Erving	1
Debra A. Russell	100 State Rd Erving	1
Bill [unclear]	106 Northfield Rd	2
Ernie [unclear]	54 French King Hwy	2
Nancy Bucci	69 State Rd	1
Carrie Marsh	16 E. Main St	1
John S. [unclear]	54 State Rd	1
Silvia Bedina	41 Forest St Erving MA	2
James M. [unclear]	105 Old State Rd	1

We, the undersigned voters in the Town of Erving, respectfully request that the Board of Selectmen put the following article on the warrant for the 1997 Annual Town Meeting:

To see if the Town will vote to direct the Selectmen to petition the Nynex Telephone Co. to have all phone service for the Town of Erving reflect the 413 area code.

NAME

RESIDENCE

PRECINCT

Richard Ford	72 Mountain Rd, Erving	1

We, the undersigned voters in the Town of Erving, respectfully request that the Board of Selectmen put the following article on the warrant for the 1997 Annual Town Meeting:

To see if the Town will vote to direct the Selectmen to petition the Nynex Telephone Co. to have all phone service for the Town of Erving reflect the 415 area code.

NAME	RESIDENCE	PRECINCT
Dennis Robinson	6 Heron St. Erving	1
Robert F. Brown	1111 Park Ave. Erving	1
Samuel P. Kelly	60 Mary St. Erving	1
Marion R. Overgaard	36 River Rd. Erving 01349	2
John S. Sweeney	170 North St. Erving	1
Kelly Boyd	19 Church St., Erving	1
John S. Sweeney	36 RIVER RD ERVING	2
Jacqueline M. Boyden	12 Stockton St Erving	2
Patricia Bernier	16 Church St Erving	1
Nancy Feltner	65 Rockledge Hwy Miller Erving MA	2
Lori Johnson	97 Mountain Rd Erving MA	1
John F. Farnsworth	34 Poplar Mtn Rd	2
John Farnsworth	34 Poplar Mtn Rd	2

Erving's area codes spur town to fight

By DIANE BRONCACCIO
Recorder Staff

ERVING. — This spring, annual town meeting voters unanimously backed a one-town, one-phone-exchange, one area-code referendum. Now they're taking their fight to Boston.

State Rep. John J. Merrigan, D-Greenfield, is drafting legislation for Erving that would bring the town together under the 413 area code and, if possible, the own telephone exchange. Although roughly half the town is slated for a shift from area codes 603 to 978 on Sept. 1, Merrigan hopes his bill — or other measures already working their way through the state Legislature — will remedy the confusion created by dual ZIP codes, area codes and telephone exchanges.

Because half the town shares its ZIP code and telephone exchanges with the Montague village of Millers Falls, residents and town officials constantly deal with state government mix-ups in filing excise bills, drivers' licenses, property taxes and even birth certificates in the wrong town. Databases organized by ZIP code have sent thousands of dollars in education aid — and even Keno lottery proceeds — to Montague, although the money was earmarked for Erving.

Even worse, the emergency "911" database works by phone number, and because of that, emergency responders have been sent to the wrong town four times in the months since Erving became part of the state police emergency response system.

Selectmen have notified businesses within the 539 telephone exchange that their business licenses

from Erving will not be renewed in 1998 unless they furnish proof they have added NYNEX to list their phone directory addresses as Erving — not as Millers Falls.

"There is in response to the E-411 situation," Selectman's Chairman Daniel Hammond said, "four times the rescue chain of calls (for Erving) went to Montague. It hasn't resulted in any loss of life — yet. But if someone at a restaurant or in the bowling alley has a heart attack for Erving, we don't want the ambulance going to Montague. We've taken these steps to remedy that (confusion)."

Merrigan said he's been talking with other legislators whose constituents are concerned about how changing telephone codes will affect them.

"There has been legislation filed previously for other communities in eastern Massachusetts, and we're looking at that legislation as it goes through the process," he said. Merrigan said he may amend that earlier legislation to include Erving, so that the town could have a specific resolution.

"There are a lot of communities facing (area code) changes, and a lot of legislation is starting to come forward, because these communities want to have input," Merrigan said. "But Erving is unique in that it's a split community with both different area codes and exchanges."

State Rep. Susan Pope, R-Wayland, is considering filing an amendment to a Senate bill that would prohibit NYNEX from splitting a community geographically by changing the area codes — an amendment that would help Z-

ving's cause as well as some towns in central Massachusetts.

Michael Penglase, a NYNEX spokesman, said the emergency response confusion could be remedied by making changes in the E-411 database, which would not require a change in area codes.

But the emergency response snafu is just the latest of many problems agencies have had with telecommunications, according to Jacques Boyden, chairman of the re-elected member ZIP/Area Code Committee for Erving.

Boyden says residents frequently buy maps when they go to sell or buy homes, with the Erving-side portion of town, or when they give their addresses as "Erving" to receiving their driver's license, and (the final license comes back with the address of "Millers Falls" on it.

She said residents in the 504 area code were left out of this year's Franklin County NYNEX directory even though the phone company promised to list both parts of town in the Alibi/Gardner and Franklin yellow pages.

"As a society, our identity is being wrapped around these numbers," she said. "As we get more and more into automated databases, this is going to occur more often."

The committee is preparing to petition the Postal Service to eliminate the town's confusing dual ZIP codes, Boyden said. Besides decimation about the mistaken emergency responses, the petition will also carry letters of support from at least 18 area businesses, Erving Town Clerk Richard Newton and Montague Town Clerk John Zyma.

JOHN W. OLVER
1st District, Massachusetts

COMMITTEE
APPROPRIATIONS

SUBCOMMITTEE
TRANSPORTATION
AIRWAY CONSTRUCTION

WHP:AT-LARGE

Congress of the United States
House of Representatives
Washington, DC 20515-2101

July 18, 1997

Joseph F. Burke, Jr.
Managing Director
NYNEX
185 Franklin Street
Room 1704
Boston, MA 02107

Dear Joe,

I am writing on behalf of the Town of Erving, Massachusetts which has sought my assistance in its efforts to unify area and zip codes for that community.


Currently, the eastern portion of Erving is part of the 508 area code and uses Orange's 544 exchange. The western part of Erving is in the 413 area code and uses Millers Falls' 659 exchange. In effect, Erving is divided by the 413/508 area code geographic boundary and does not have its own telephone exchange.

The Town of Erving has formed the Erving Area/Zip Code Committee to study and seek solutions to the problems created by this situation. A major problem cited, for example, is 911 emergency response services and potentially dangerous confusion created by the current area code/exchange configuration.

I respectfully request your review of Erving's interest in unifying its area code and telephone exchange. Any information you could provide me so that I might assist Erving would be greatly appreciated. If you have questions or need additional info, please contact me or David Narkewicz in my Holyoke office at (413) 532-7010.

Thank you in advance for your attention to this matter.

Sincerely,


John W. Olver
Member of Congress

JWO:djn

1077 LEONARD HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-2101

(202) 225-5335
(202) 226-1224 Fax

DISTRICT OFFICES:

450 WESTFIELD ROAD
HOLYOKE, MA 01540
(413) 532-7010
(413) 532-6543 Fax

CONTE FEDERAL BUILDING
78 CENTER STREET
PITTSFIELD, MA 01201
(413) 442-0848
(413) 443-2792 Fax

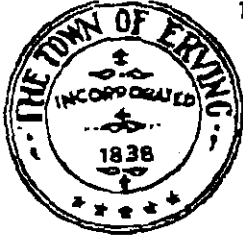
463 MAIN STREET
FRIDEBURG, MA 01420
(508) 543-8722
(508) 543-8788 Fax

08/05/97

16:11

508 460 5038

Enclosure (2)



TOWN OF ERVING

P. O. Box 188 12 East Main Street
ERVING, MASSACHUSETTS 01344

May 12, 1997

Jacquelin M. Boyden
12 Strachan St.
Erving, MA 01349

Dear Mrs. Boyden:

Thank you for volunteering to serve the Town on the Zip Code and Area Code Committee. The Selectmen voted this evening to appoint you to serve on this committee. The organizational meeting of the Zip Code and Area Code Committee will be on Monday, May 19 at 7:30 p.m.

Although this committee will have different tasks, this organizational meeting will be held at the same time as the organizational meeting of the Zip Code and Area Code Committee.

Thank you for offering your time and talents for this worthwhile endeavor. If successful the work your committee will do will serve to unify our community. We look forward to working with you as this process unfolds.

Sincerely,

Handwritten signature of Daniel B. Hammock in cursive.

Daniel B. Hammock, Chair
Board of Selectmen

Handwritten signature of Dennis E. Rindone in cursive.

Dennis E. Rindone

Handwritten signature of Edward G. Kavanaugh in cursive.

Edward G. Kavanaugh

Bell Atlantic
185 Franklin Street, Room 1403, Boston, MA 02110
Tel (617) 743-7331
Fax (617) 737-0648



Barbara Anne Sousa
Regulatory Counsel

April 3, 1998

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
Leverett Saltonstall Building
100 Cambridge Street
Boston, Massachusetts 02202

RECEIVED
MASS. DEPT. OF
PUBLIC UTILITIES
APR 3 4 12 PM '98

Re: D.T.E. 97-109 – Petition of Erving

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find New England Telephone and Telegraph Company, d/b/a Bell Atlantic-Massachusetts' ("BA-MA") special study regarding alternative proposals to address the Town of Erving's petition. This study is a follow-up to the Company's February 20, 1998, filing.

Thank you for your assistance in this matter.

Sincerely yours,

Barbara Anne Sousa
Barbara Anne Sousa

cc: Joan Foster-Evans, Esquire, Hearing Officer
Ms. Jacquelyn M. Boyden, Town of Erving
Mr. Daniel B. Hammock
Mr. Dennis E. Rindone
Mr. Edward G. Kavanaugh

D.T.E. 97-109 - FOLLOW-UP STUDY OF ERVING PROPOSAL

On February 20, 1998, Bell Atlantic filed a preliminary analysis of BA-MA's technical, operational, and cost issues relating to the proposal described in BA-MA's February 2, 1998 letter on issues raised by the Town of Erving in the above-entitled docket.

In its February filing, the Company explained that the proposal appeared feasible but since such a proposal had never been implemented before by BA-New England, an extensive special study would be required to determine the extent of its impact on BA-MA - in particular, the Company's numerous information, provisioning, maintenance, and billing and customer contact systems. In addition, the Company recommended that DXCs be involved in the review process prior to any Department decision regarding this proposal.

This follow-up study provides a more detailed analysis of the impacts of this and two other alternatives.

The Alternatives

In addition to the Alternative BA-MA examined in its preliminary report ("Alternative 1"), the Company has examined another alternative for providing the Erving customers currently in the Orange exchange with a 413 area code and a dedicated NXX code. In Alternative 1, customers would remain in the eastern LATA; in Alternative 2 (A and B), customers would be moved into the western LATA.

Under Alternative 1, BA-MA would move Erving customers served by the Orange exchange (978-544-XXXX) from the 978 area code to the 413 area code, which serves the rest of Erving. There would be no change in the LATA and exchange boundaries, but rather the 413 area code would be assigned in the eastern Massachusetts LATA for the limited purpose of serving these approximately 400 Erving customers (about 650 lines). A second NXX code could be assigned to the Erving customers in the Millers Falls exchange if these latter customers agree to change their telephone numbers.

Under Alternative 2, BA-MA would petition the FCC to allow the LATA boundary to be moved so that all Erving customers would be in the 413 area code and the western LATA. The exchange boundary between the Orange and Millers Falls exchanges would also be realigned, at the Department's direction, so that all Erving customers would reside in the Millers Falls exchange. There are two ways to implement Alternative 2:

Alternative 2A: The Company would build new facilities so that Erving customers in the Orange exchange would be served from the Millers Falls switch instead of the Orange switch. This is similar to the work the Company did to re-align pocket customers in the eastern LATA as part of the recent area code relief effort. One new NXX code would be opened in the Millers Falls exchange to serve either the Erving customers from the Orange exchange or all Erving customers.

Alternative 2B: The Company would open a new 413 NXX code in the Orange switch to serve the Erving/Orange customers, but the new code would be assigned a Millers Falls rate center. Another NXX code could be opened in the Millers Falls switch to serve Erving customers whose service is provided from Millers Falls if those latter customers agree to take a number change.

Bell Atlantic's Recommendation

The results of this follow-up study indicate that Alternatives 1, 2A, and 2B are technically feasible. The Company recommends Alternative 2B for the following reasons:

- It would provide the entire Town of Erving with what it has requested -- numbers in the 413 area code, new NXX code(s) dedicated to the Town of Erving, and a cohesive identity as a western LATA community.
- It avoids the establishment of an exception in the network which would be required under Alternative 1 and would be difficult to maintain on an ongoing basis (see preliminary study, filed February 20).
- It would eliminate the need to engineer and build new facilities, as required under Alternative 2A.
- It is the least expensive of the alternatives examined.

In addition, BA-MA recommends that Erving customers be polled on their preference between Alternative 2B versus retaining their current service since the Orange/Erving customers would be required to change their telephone numbers and those residence customers currently subscribing to the eastern MA unlimited or the Baystate East optional calling plans would lose those services.

Technical Feasibility and Work Requirements

All alternatives examined are technically feasible. This is based on analyses conducted by the following organizations:

- Network Services (switch programming, SS7 network programming)
- Infrastructure Provisioning (switch capacity, outside plant, interoffice facilities)
- Installation and Maintenance (systems and procedures)
- Service Provisioning (systems and procedures)
- Billing and Customer Contact Systems
- Information Systems
- Operator Services
- NIRC/Telephone Directories

Alternative 1

As the Company explained in its preliminary report, assigning a 413 NXX code in the eastern Massachusetts LATA, which today's network associates with the western LATA, creates an exception in the network that complicates ongoing maintenance. The delay in finding and fixing troubles from and to the Orange/Erving telephone lines as a result of this exception raises public safety concerns and puts in jeopardy the Company's ability to maintain service standards.

This alternative would require:

- the switch programming work described in the Company's preliminary report, including updates to SS7 Signaling Transfer Points (STPs)
- trunking work from the Orange switch to the Company's Operator Services TOPS switch to accommodate the new 413 NXX code for Orange/Erving customers.
- Operator Services methods and training and other Operator Services work in the TOPS switch to accommodate the trunking change
- modifications and testing in the impacted billing and customer contact systems and in other information systems
- service order methods, training of service reps, and service orders issued to change each customer's telephone number,
- service provisioning work to monitor service-order flow and service activation and to update provisioning systems
- maintenance and dispatch work to accommodate the telephone number changes, including updates to five maintenance systems, and updates to methods and procedures for installation-and-maintenance and central-office technicians
- changes in the customer listing and customer guide pages of the Franklin County, Gardner/Athol, and Fitchburg/Leominster/Clinton area telephone directories
- customer education

In addition, AT&T may need to build 413 trunks from the Company's Orange switch to the AT&T Operator Services OSPS switch.

The Company estimates that the implementation of this alternative could begin in the fourth quarter of this year, assuming a DTE order no later than May 1 and completion of customer polling by June 1.

Alternative 2A

This alternative would require all of the work above, although there would be less switch programming work required since the 413 NXX code would reside in the Millers Falls switch and would not need to be treated as an exception in the network. In addition, there would be no SS7 work and no TOPS trunking work required and there would be slightly less maintenance and dispatch work required since the 413 NXX would not be rated as an eastern LATA code.

However, this option would require that new facilities be built so that Erving customers in the Orange exchange receive dial tone from the Millers Falls switch rather than the Orange switch. The facilities would include extra capacity in the Millers Falls switch to accommodate the additional customers that would be served (this capacity does not presently exist in that switch) and the outside plant facilities to give Erving/Orange customers dial tone from the Millers Falls switch ("re-homing"). Additional service provisioning work would be required for the re-homing and about two months of work would be required for modifications to the E-911 and Premis systems -- work not required with Alternatives 1 and 2B.

BA-MA could begin to implement this alternative in the third quarter of 1999, because of the need to plan for, engineer, and build new outside plant facilities to re-home Orange/Erving customers to the Millers Falls switch. In addition, since this alternative would require a LATA boundary change, it would require FCC approval under the Telecommunications Act of 1996. Based on past experience with similar requests, LATA boundary waivers have generally been decided within two to five months.

Alternative 2b

This alternative would require the work described in Alternative 1, with less switch programming work needed since the 413 NXX code would be rated to Millers Falls in the western LATA and therefore would not need to be treated as an exception in the network.

The amount of Maintenance and Dispatch work required is the same as under Alternative 2A and less than under Alternative 1. The switch capacity and outside plant work described under Alternative 2A above would not be needed since the Erving customers in the Orange exchange would continue to be served from the Orange switch but would receive new 413 telephone numbers assigned to the Millers Falls rate center.

This alternative, like Alternative 2A, would require FCC approval under the Telecommunications Act of 1996. Past BA requests for LATA boundary waivers to provide local calling across a LATA boundary have been granted within two to five months. The Company estimates that the implementation of this alternative could begin as early as the fourth quarter of this year, assuming a DTE order no later than May 1, completion of customer polling by June 1, and FCC approval.

Costs

The costs below reflect the requirements listed in the previous sections of this report. These costs do not include customer education and changes to the telephone directories, which are updated via the service orders required for the telephone number changes — the cost for which is already included in the totals below.

These costs assume that only the Erving customers currently in the Orange exchange will have telephone number changes. If the Erving customers in the Millers Falls exchange opt for a number change to a dedicated NXX code, the total cost would increase to reflect the additional service orders and provisioning work that would be required. In addition, the costs provided herein are subject to change since the actual implementation of a project involving many functional areas often uncovers additional requirements not identified in the impact assessment of each individual work group.

Alternative 1

The cost for this alternative is \$560,000. This does not include the additional ongoing work required to maintain an exception in the network and the additional time that might be required to identify and fix troubles.

Alternative 2A

The total cost for this alternative is between \$900,000 and \$1.15 million, depending on the extent of the work required to build the new outside plant facilities. The outside plant alone would range from a minimum of \$250,000 to about \$500,000, with the actual cost determined once the project is engineered.

Alternative 2B

The total cost for this alternative is \$520,000.

FEB 24 1998 10:03 PM BELL ATLANTIC
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Barbara Anne Sousa
Regulatory Counsel



February 20, 1998

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
Leverett Saltonstall Building
100 Cambridge Street
Boston, Massachusetts 02202

Re: D.T.E. 97-109 -- Petition of Erving

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find New England Telephone and Telegraph Company's, d/b/a Bell Atlantic-Massachusetts' ("BA-MA") analysis of the proposal raised at the January 26, 1998, public hearing and described in BA-MA's February 2, 1998, letter to the Department.

As a result of its preliminary analysis, BA-MA will proceed with a special study to better assess the work required and costs to implement the Erving proposal. BA-MA also recommends that the Department seek comments from interexchange carriers regarding the feasibility of that proposal and that the Department permit BA-MA to begin polling Erving customers to determine consumer preference.

Thank you for your assistance in this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Barbara Anne Sousa".

Barbara Anne Sousa

cc: Joan Foster-Evans, Esq., Hearing Officer
Jacquelyn M. Boyden, Town of Erving

D.T.E. 97-109 -- PRELIMINARY ANALYSIS OF ERVING PROPOSAL

This preliminary analysis examines BA-MA's technical, operational and cost issues relating to the proposal described in BA-MA's February 2, 1998, letter to address issues raised by the Town of Erving at the January 26, 1998, public hearing in the above-entitled docket.

I. Summary

Under the proposal, BA-MA would move Erving customers served by the Orange exchange (978-544-XXXX) from the 978 area code to the 413 area code, which serves the rest of Erving. There would be no change in the LATA and exchange boundaries, but rather the 413 area code would be assigned in both the eastern and western Massachusetts LATAs for the limited purpose of serving these approximately 300-400 Erving customers. In addition, two new 413 NXX codes would be requested to serve Erving customers in the Miller Falls and Orange exchanges.

Based on a preliminary review, this proposal appears to be technically feasible from a switch programming perspective. However, this proposal has never been implemented in Bell Atlantic-New England and, therefore, an extensive special study would be required to determine the extent of the impact on BA-MA, in particular its numerous information, provisioning, billing and maintenance systems, the time required to implement that proposal, and the associated costs for any necessary modifications. Such a complex study would require approximately six weeks to complete.

Regarding assignment of two new 413 NXX codes, it appears that the neutral Central Office Code Administrator (currently Bell Atlantic) would provide the dedicated codes desired, eliminating the need for Erving customers to share an NXX code with other communities in the Millers Falls and Orange exchanges. This is based on the Town of Erving's unique situation in being bisected by a LATA and area code boundary and the current adequate supply of available 413 NXX codes.

In addition to technical and numbering issues, BA-MA is extremely concerned that the unique serving arrangement for Erving would directly affect BA-MA's ability to effectively and efficiently maintain the network on an ongoing basis, as explained below. In particular, that "area code" exception for Erving may interfere with network integrity and the speed with which troubles can be identified and remedied, thereby raising potential public safety issues. Likewise, that exception arrangement would presumably require that interexchange carriers ("IXCs") modify their switches and may similarly complicate their ongoing network maintenance. Accordingly, it is critical that IXCs be involved in the review process prior to any Department decision regarding this proposal.

II. Preliminary Network/ Systems Requirements and Cost Estimates

As discussed above, BA has estimated only the switch programming costs to implement the 413 area code boundary relocation proposal for Erving. A special study is required to assess other network/systems requirements and costs, such as trunk construction, additional trunking equipment, and SS7 network modifications.

Switch Programming

BA-MA's cost estimate to complete the switch programming work described below is approximately \$50,000. This is based on approximately 40 hours of work by BA's Software Provisioning and Network Services groups in the DMS10 switch that serves the Orange exchange to make that switch a dual-NPA and dual-LATA office (currently it serves one area code, 978, in the eastern Massachusetts LATA).

To activate a new NXX code, programming work is required in all end-office switches in the LATA and the tandems in other LATAs. However, there would be substantial incremental work required in the eastern Massachusetts switches and the western Massachusetts tandems to open a 413 NXX code in the Orange exchange because of the fact that 413 NXXs currently reside in the western Massachusetts LATA only. In addition, BA would need to modify every end-office switch in the western Massachusetts LATA, as well as all switches in surrounding states that currently serve customers in Massachusetts.

The additional translations work described above would be required for every rate center in every switch in the 617, 781, 508, and 978 area codes so that calls originating from these rate centers and terminating to numbers in the Orange/Erving 413 exchange code are properly routed over *intraLATA* facilities. Currently, all traffic from the eastern LATA to the 413 area code automatically gets routed over *interLATA* facilities. Likewise, all traffic from the 413 area code in LATA 126 to the 413-NXX serving the Orange portion of Erving in LATA 128 would need to be routed over *interLATA* facilities, requiring special translations work in every rate center in every switch in western Massachusetts. Currently, all calls originating and terminating in the 413 area code are assumed to be *intraLATA*.

Trunks and Trunk Equipment

New trunks would need to be built from the Orange DMS10 switch to AT&T's Operator Services (OSPS), Bell Atlantic's Operator Services (TOPS), and the 413 tandem switches to accommodate calls from and to the Orange/Erving 413 exchange code. Today, all calls from the Orange switch are transported over 978 trunks, which identify the originating caller as a customer with a number in the 978 area code. Likewise, calls to 978 customers in the Orange exchange from elsewhere are delivered over the same 978 trunks. These trunks cannot carry originating or terminating 413 traffic, requiring that

new trunks be built before opening a 413 NXX code for Erving customers in the Orange exchange.

A special Engineering study is required to determine the cost of the trunk construction work as well as the cost and need for additional trunking equipment in the central office.

SS7 Network

Approximately 20 hours of software programming work would be required in the SS7 network's four Signaling Transfer Points (STPs) to create a routing exception, similar to that described above under "Switch Programming," to ensure that calls are properly routed over the SS7 network. Creating an exception in the network adds to the complexity of all subsequent work required in the STPs and increases the chance of problems occurring at some point in time. The cost for this software programming work has not been determined, but is not expected to be significant.

Systems Work

The Premis system, which performs address validation and telephone number selection for service order negotiations, is a key system that would be impacted by this proposal. BA-MA verified that Premis would be able to assign telephone numbers in the new dedicated NXX to existing and future Erving customers, but that systems work would need to be done to ensure that:

- Erving customers in the Orange exchange would be assigned numbers with the dedicated 413-NXX designation;
- Erving customers would be prevented from receiving numbers in the existing 978-544 exchange code currently serving the entire Orange exchange, including a portion of Erving; and
- Customers in the Orange exchange who are not located in the town of Erving would be prevented from receiving numbers in the new dedicated Erving 413-NXX

The cost for this systems work has not been determined, but is not expected to be significant. The costs of other necessary systems work for the many information, provisioning, billing, and maintenance systems would be determined in a special study.

III. Other Potential Network Concerns and Public Safety Issues

The time required for BA-MA to diagnose and repair network troubles would increase significantly under this proposal for Erving customers served by the Orange switch, since the logical assumptions used to quickly isolate troubles would no longer hold true.

For instance, in the initial screening of troubles, BA and other carriers could mistakenly identify troubles from 978, 508, 617, and 781 numbers to 413 numbers in the Orange exchange as interexchange carrier inter-LATA troubles when they are actually intra-LATA troubles. Likewise, troubles originating from 413 western LATA numbers to the 413 Orange exchange serving Erving could easily be mistaken for intra-LATA troubles when they are actually inter-LATA interexchange-carrier troubles. Interexchange carriers might end up trouble shooting at their 413 Point of Presence (POP) instead of at their eastern LATA POP, etc. BA Repair or business office personnel might refer customers reporting such troubles to their inter-LATA carrier.

The delay in finding and fixing troubles from and to the Orange/Erving telephone lines as a result of this exception in the network raises public safety concerns and puts in jeopardy the Company's ability to maintain service standards.

This proposal creates an exception to normal network functions. Assigning in the eastern Massachusetts LATA a single 413 NXX code, which today's network associates with the western Massachusetts LATA, is not an integral, standard part of the way the network operates once the 413 NXX is opened in the Orange exchange. The network in the eastern Massachusetts LATA does not screen beyond the area code, if the terminating area code indicates that the caller is dialing outside his/her LATA. These calls are handed off to the customer's interLATA carrier. Screening to the sixth digit (NPA-NXX) is done when the area code dialed is within the same LATA as the caller. This screening determines to which area code *and* end office the call should be sent.

Assigning 413 NXX codes in the eastern Massachusetts LATA could become standard if and when, for instance, geographic number portability beyond a LATA is introduced. But that is not the way the network functions now or the way it will function for the foreseeable future. Until such time, a single 413 code in the eastern Massachusetts LATA will need to be maintained as an exception to the logic of the way the network is configured and will be counter-intuitive for anyone whose job it is to analyze and fix troubles as well as those who make ongoing programming changes to the network.

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Barbara Anne Sousa
Regulatory Counsel

May 14, 1998

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
Leverett Saltonstall Building
100 Cambridge Street
Boston, Massachusetts 02202

Re: D.T.E. 97-109 -- Petition of Erving

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find New England Telephone and Telegraph Company, d/b/a Bell Atlantic-Massachusetts' ("BA-MA") Responses to the Department's First Set of Information Requests, Nos. 1 through 5.

Thank you for your assistance in this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Barbara Anne Sousa".

Barbara Anne Sousa

cc: Joan Foster-Evans, Esquire, Hearing Officer
A. Quincy Vale, Esquire, Hearing Officer
Ms. Jacquelyn M. Boyden, Town of Erving
Mr. Daniel B. Hammock
Mr. Dennis E. Rindone
Mr. Edward G. Kavanaugh

SERVICE LIST**TOWN OF ERVING**

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NEW ENGLAND TELEPHONE AND TELEGRAPH**COMMONWEALTH OF MASSACHUSETTS****DOCKET NO. 97-109**

REQUEST: Department of Telecommunications and Energy, Set #1

DATE: May 12, 1998

ITEM: DTE-1-1 How should expenses incurred in implementing any of the alternatives be funded? Will the Company's ratepayers be asked to bear any of the expense? If so, please explain how the Company plans to recover these expenses under its current price cap mechanism.

REPLY: The costs for the Erving project would constitute exogenous costs under the Price Cap plan approved by the Department in D.P.U. 94-50. Under that plan, exogenous costs are reflected in the price cap formula if they exceed \$3 million in total. BA-MA would add the cost of this project to other exogenous costs (positive or negative) for the study period used for the price cap filing, and it would then reflect the change in calculating the price cap formula. The impact, if any, of the Erving project's exogenous on a future price cap filing cannot, therefore, be quantified in isolation because it is only one variable that can affect the calculation of the price cap formula.

NET #1

NEW ENGLAND TELEPHONE AND TELEGRAPH**COMMONWEALTH OF MASSACHUSETTS****DOCKET NO. 97-109**

REQUEST: Department of Telecommunications and Energy, Set #1

DATE: May 12, 1998

ITEM: DTE-1-2 On page 4, under the **Costs** section, it is stated that "[t]he costs below reflect the requirements listed in the previous sections of this report. These costs do not include customer education and changes to the telephone directories which are updated via the service orders required for the telephone number changes -- the cost for which is already included in the totals below." Please identify the costs for customer education and changes to the telephone directories, as well as the service order costs.

REPLY: The cost for customer education, assuming that only Erving customers in the Orange exchange receive number changes, would be approximately \$6,300. This does not include the approximately \$3,000 required for advance polling of the Erving customers in the Orange exchange.

The cost to Bell Atlantic Yellow Pages Company for changing the directory listings to reflect the new 413 telephone numbers for the Erving customers currently in the Orange exchange is approximately \$5,000 for alternative 1 and approximately \$10,000 for alternatives 2A and 2B.

See the Company's reply to DTE-1-4 for the service order costs.

NET #2

NEW ENGLAND TELEPHONE AND TELEGRAPH**COMMONWEALTH OF MASSACHUSETTS****DOCKET NO. 97-109****REQUEST:** Department of Telecommunications and Energy, Set #1**DATE:** May 12, 1998

ITEM: DTE-1-3 On page 4, under the Costs section, it is stated that "[t]he costs provided herein are subject to change since the actual implementation often uncovers additional requirements not identified in the impact assessment of each individual work group." Please give examples of such "additional requirements," and give an estimate, if possible, of the total additional cost that these requirements might require. What is the maximum cost for each proposal?

REPLY: The Company cannot provide examples of additional requirements for the implementation of the Erving proposal since an implementation team is not in place and won't be created until there is a project to implement. However, the Company's experience with projects involving multiple work groups is that additional requirements are identified by the project team during implementation that were not identified when individual organizations provided their own, separate impact assessments in advance of any implementation. The additional requirements could result from the impact of one work group's efforts on another, creating unanticipated requirements for the latter group. It could also result from work requirements not identified by any group up front -- requirements which surface once the project team delves into the details of the actual implementation.

Since it is not possible at this time to identify what additional work may be required, it is not possible to provide a cost for additional requirements.

NET #3

NEW ENGLAND TELEPHONE AND TELEGRAPH

COMMONWEALTH OF MASSACHUSETTS

DOCKET NO. 97-109

REQUEST: Department of Telecommunications and Energy, Set #1

DATE: May 12, 1998

ITEM: DTE-1-4 On page 2, under the section titled **Technical Feasibility and Work Requirements**, it is stated that the alternatives "are technically feasible...[and that t]his is based on analyses conducted by [several] organizations." Following a list of these organizations is a list (on page 3) of work functions that must be performed for Alternative 1. On page 4, in describing Alternative 2B, it is said that "[t]his alternative would require the work described in Alternative 1." Finally, the last sentence on page 4 states that "[t]he total cost for this alternative [2B] is \$520,000." Please list, for each work function within the appropriate organization, the costs for alternative 2B, which, in addition to the costs identified in DTE-1-2 and DTE-1-3 above, total \$520,000.

REPLY:	Network Services	
	Switch Programming	\$42,500
	SS7 STP Programming	1,500
	Infrastructure Provisioning	
	Trunking	500
	Installation and Maintenance	
	Systems updates	36,000
	Project Planning/Meetings	24,000
	Network Methods and Procedures (contractor)	4,000
	Other Methods and Procedures; I&M/CO technician support	97,000
	Service Provisioning	
	Service Orders (for Erving/Orange customers only)	47,800
	RCMAC (service order flow and monitoring service order activity)	25,000

NET #4

-2-

REPLY: DTE 1-4	Information Systems, including	
	Billing and Customer Contact Systems	
	Systems updates	232,000
	Operator Services	
	Operator Training/Methods	
	and Procedures	9,500
	TOTAL	\$519,800

As stated in the Company's April 3 filing in this docket, the \$520,000 does not include customer education and telephone directory changes. Those additional costs total approximately \$16,300, as detailed in the Company's Reply to DTE-1-2.

NET #4

NEW ENGLAND TELEPHONE AND TELEGRAPH

COMMONWEALTH OF MASSACHUSETTS

DOCKET NO. 97-109

REQUEST: Department of Telecommunications and Energy, Set #1

DATE: May 12, 1998

ITEM: DTE-1-5 Please [in] detail how each of the proposed alternatives impacts, if at all, the following services provided to BA-MA customers in the Town of Erving: #1) The provision of directory assistance and other operator services, #2) the updating, printing, and distribution of telephone directories, and #3) existing calling plans.

REPLY: The impact of each of the three alternatives on #1) The provision of directory assistance and other operator services, #2) the updating, printing, and distribution of telephone directories, and #3) existing calling plans is as follows:

- #1) All three alternatives would have no adverse impact on the Company's provisioning of directory assistance and other operator services. The Company would update its systems to provide Call Completion Service (CCS) and Directory Assistance (DA) operators with the customers' new 413 telephone numbers. Methods and Procedures would be written and operators would be trained. The Company cannot answer for other companies providing these types of services.
- #2) Today, customers in the 978-544 Orange exchange receive a free white page appearance in the "Gardner/Athol Area," "Fitchburg/Leominster/Clinton Area," and "Ayer Area" directories, which have common white pages, and a free yellow page appearance in the "Gardner/Athol Area" directory. With Alternative 1, the directories in which customers are listed would not change. With alternatives 2A and 2B, Erving customers currently served from the Orange exchange would receive a white page appearance in the Franklin County and Hampshire County directories and a yellow page appearance in the Franklin County directory. Customer Guide pages, which appear at the front of the directories, would be updated to include the new 413 NXX code for the Erving customers.

-2-

REPLY: DTE 1-5
(cont'd)

- #3) With Alternative 1, Erving customers in the Orange exchange would retain their existing calling plans. With alternatives 2A and 2B, the Erving customers would be served by the Millers Falls rather than the Orange exchange. As a result, they would no longer be able to subscribe to Measured Circle Calling and the eastern MA unlimited and Baystate East optional calling plans. However, customers would be able to subscribe to the Call Around 413 and Call Around 413 Plus optional calling plans.**

NET #5